

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Patricia Southerland	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 19-12133MDC

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PNC BANK N.A.

COMES NOW, Debtor, Patricia Southerland, hereinafter referred to as "Debtor," by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by PNC Bank, N.A., "Movant", and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Denied.
6. Denied.
7. Denied. By way of further response, Debtor requests a post-petition mortgage payment history.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: March 25, 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008